



Kansas Department of Health and Environment
Bureau of Air and Waste Management
Forbes Field, Topeka, Kansas 66620

Hazardous Waste Generator/ Transporter Compliance Inspection Report

General

Time 9:45 A.M. Date 3/14/90

Facility Name Coffeyville Re-Con, Inc. EPA ID No. KSD091353153

Street 2410 Brown Street City Coffeyville, KS Zip 67337

Mailing Address (if different than above) _____

County Montgomery Phone (316) 251-1520

Contact(s) Mike Kudrick, Safety Director; Nathan Charles Kudrick, Plant Manager

Inspector(s) Bill Towery

Type of Business Drum reconditioning

Has the company declared any information/processes as trade secrets (K.S.A. 65-3447)? Yes ☐ No ☒
If yes, explain. _____

Industrial Wastes Generated

(List hazardous wastes first)


R00098091
RCRA Records Center

Waste:	Sodium hydroxide sludge	Wastewater treatment sludge
If waste is hazardous, give H.W. ID Number:	D002-D005-D006-D007-D008	Not hazardous
Amount generated per month:	1,000 gallons	Unknown
Amount presently in storage:	None	Unknown
Accumulation time:	--	--
Present disposal method:	USPCI--Lone Mountain, OK	Discharges to city WW system with rinse water

Waste:	Paint overspray and floor sweepings	Waste oil
If waste is hazardous, give H.W. ID Number:	D008	Not hazardous
Amount generated per month:	20-25 gallons	3,000 gallons
Amount presently in storage:	None	3,000 gallons
Accumulation time:	--	1 month
Present disposal method:	Mixed with NaOH sludge for disposal by USPCI	National Oil Springfield

Waste:	Waste paint filters	
If waste is hazardous, give H.W. ID Number:	Not hazardous	
Amount generated per month:	Eight 36" x 7' panels	
Amount presently in storage:	None	
Accumulation time:	--	
Present disposal method:	Burned at plant site	

Waste:		
If waste is hazardous, give H.W. ID Number:		
Amount generated per month:		
Amount presently in storage:		
Accumulation time:		
Present disposal method:		

Waste:		
If waste is hazardous, give H.W. ID Number:		
Amount generated per month:		
Amount presently in storage:		
Accumulation time:		
Present disposal method:		

- I. Has the facility evaluated all potentially hazardous waste(s) to determine if it is hazardous? (K.A.R. 28-31-4(b)) ☒ Yes ☐ No ☐ NA
 A. If waste(s) was tested, was the analysis conducted by a laboratory certified by KDHE? (K.A.R. 28-31-4(f)) ☒ Yes ☐ No ☐ NA
 B. If waste(s) was tested, are the results kept for three years? (K.A.R. 28-31-4(f)(1)(c))? ☒ Yes ☐ No ☐ NA
- II. If hazardous waste(s) is disposed of via the sanitary sewer to a Publicly Owned Treatment Works (POTW) has written permission been obtained from the operator of the POTW? (K.A.R. 28-31-3/40 CFR 261.4) Yes ☒ No ☐ NA
- III. If industrial waste(s) is disposed of at a permitted sanitary landfill, has a disposal authorization been obtained? (K.A.R. 28-29-23) Yes ☒ No ☐ NA
 A. If yes, list the authorization number(s): _____
- IV. Facility size classification:
☐ Not a Gen. ☐ Small Qt. Gen. ☐ Ks. Gen. ☒ EPA Gen.
☐ T/S/D Facility ☐ Transporter ☐ H.W. Burner/Marketer ☐ Used oil Burner/Marketer

Hazardous Waste Determination Requirements:	<input checked="" type="checkbox"/> Adequate	<input type="checkbox"/> Inadequate
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Notification Requirements

- V. Has generator Notified KDHE and obtained an EPA Identification Number? (K.A.R. 28-31-4(c)) ☒ Yes ☐ No ☐ NA
- VI. Is current Notification accurate? (K.A.R. 28-31-4(e))
 A. Is this facility marketing (selling) hazardous waste as a fuel? Yes ☒ No ☐ NA
 B. Is this facility marketing (selling) used oil as a fuel? Yes ☒ No ☐ NA
 (If yes, to either question A or B, complete Used Oil Fuel Marketers/Blenders Checklist.)
 C. Is this facility burning hazardous waste as a fuel? Yes ☒ No ☐ NA
 D. Is this facility burning used oil as a fuel? Yes ☒ No ☐ NA

Notification Requirements:	<input checked="" type="checkbox"/> Adequate	<input type="checkbox"/> Inadequate	<input type="checkbox"/> NA
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(If small quantity generator, stop here.)

Manifests

VII.	Is a contractual agreement used in place of manifesting? (K.A.R. 28-31-4(c))	Yes	<input checked="" type="radio"/> No	
A.	If yes, does the contractual agreement include the type of waste and frequency of shipments?	Yes	No	
B.	If yes, is the vehicle used to transport the waste owned and operated by the reclaimer of the waste?	Yes	No	
C.	If yes, is a copy of the agreement kept for a period of three years after termination of agreement?	Yes	No	<input checked="" type="radio"/> NA
VIII.	Is a current manifest showing revision date and burden disclosure statement used? (K.A.R. 28-31-4(d)/40 CFR 262.20)	Yes	No	<input checked="" type="radio"/> NA
A.	If yes, does manifest(s) include:			
1.	Generator EPA Identification Number (twelve digit) and manifest document number (five digit)?	<input checked="" type="radio"/> Yes	No	NA
2.	Number of pages?	<input checked="" type="radio"/> Yes	No	
3.	Generators name and mailing address?	<input checked="" type="radio"/> Yes	No	
4.	Generators phone number?	<input checked="" type="radio"/> Yes	No	
5.	Transporter 1 Name?	<input checked="" type="radio"/> Yes	No	
6.	Transporter 1 EPA Identification Number?	<input checked="" type="radio"/> Yes	No	
7.	Transporter 2 Name?	Yes	No	<input checked="" type="radio"/> NA
8.	Transporter 2 EPA Identification Number?	Yes	No	<input checked="" type="radio"/> NA
9.	Name and site address of designated facility?	<input checked="" type="radio"/> Yes	No	
10.	Designated facility's EPA Identification Number?	<input checked="" type="radio"/> Yes	No	
11.	Waste Description (DOT shipping name, hazard class, and Identification Number)?	<input checked="" type="radio"/> Yes	No	
12.	Number and type of containers?	<input checked="" type="radio"/> Yes	No	
13.	Total Quantity?	<input checked="" type="radio"/> Yes	No	
14.	Unit (weight or volume)?	<input checked="" type="radio"/> Yes	No	
15.	Special handling instructions?	<input checked="" type="radio"/> Yes	No	NA
16.	Generators certification including waste minimization statement, generators signature and date?	<input checked="" type="radio"/> Yes	No	
17.	Name, signature and date of transporter 1?	<input checked="" type="radio"/> Yes	No	
18.	Name, signature and date of transporter 2?	Yes	No	<input checked="" type="radio"/> NA
B.	Does generator retain a copy of manifest(s) signed by both generator and transporter? (K.A.R. 28-31-4(d)/40 CFR 262.23)	<input checked="" type="radio"/> Yes	No	
C.	Does generator retain copy of manifest(s) signed and dated by T/S/D/ facility owner/operator for three years? (K.A.R. 28-31-4(f)(1)(A))	<input checked="" type="radio"/> Yes	No	
D.	Has generator ever failed to receive a signed copy of a manifest within 45 days of initiating a shipment?	Yes	<input checked="" type="radio"/> No	
1.	If Yes, was exception report(s) filed? (K.A.R. 28-31-4(f)(4))	Yes	No	<input checked="" type="radio"/> NA
2.	If Yes, was copy retained for 3 years? (K.A.R. 28-31-4(f)(1)(B))	Yes	No	<input checked="" type="radio"/> NA

Manifesting Requirements:

☒ Adequate

☐ Inadequate

☐ NA

Land Disposal Restrictions Requirements

- IX. Does facility generate any wastes subject to the land disposal restrictions requirements of 40 CFR 268, Subparts B and C? Yes ☒ No ☐
List these wastes:

A. D002 D. D007
B. D005 E. D008
C. D006 F. _____

- X. Is the waste(s) covered by a National Variance(s), Extension, or Petition? (40 CFR 268 5&6) Yes ☐ No ☒
A. If Yes, describe the variance, extension, or petition which applies:

- XI. Is the waste covered by an exemption? (40CFR 268.1(c)(3)) Yes ☐ No ☒

- A. If yes, does the generator provide a notice with the waste to the T/S/D facility stating that the waste is exempt from the land disposal restrictions? (40CFR 268.7(a)(3)) Yes ☐ No ☒

- XII. Does generator ship waste(s) covered by the Land Disposal Restrictions off-site for treatment or disposal? Yes ☒ No ☐

- A. If Yes, does the generator provide a Notification to the T/S/D facility that includes: EPA hazardous waste number(s), applicable treatment standards, manifest number(s), and waste analysis data, if available? (40CFR 268.7) Yes ☐ No ☒

- B. If yes, is a copy of this notification kept for 5 years? Yes ☒ No ☐

- XIII. Does generator treat restricted waste(s) on-site so that they are below the land disposal restrictions standards? (If Yes, fill out land disposal restrictions checklist.) Yes ☐ No ☒

Last two manifests did not have land ban certifications.

Land Disposal Restrictions Requirements: ☐ Adequate ☒ Inadequate ☐ NA

Pre-Transport Requirements

- XIV. Does generator package waste in accordance with DOT requirements? (K.A.R. 28-31-4(e)(1)) Yes ☐ No ☐ NA ☒

- XV. Does generator label (flammable liquid, poison, etc.) each package in accordance with DOT requirements of 49 CFR 172.101 or 172.102? (K.A.R. 28-31-4(e)(2)) Yes ☐ No ☐ NA ☒

- XVI. Does generator mark (consignee's or consignor's name and address, etc) on each package in accordance with DOT requirements of 40 CFR 172 Subpart D? (K.A.R. 28-31-4(e)(3)) Yes ☐ No ☐ NA ☒

- A. Does generator mark each container of 110 gallons or less as below? (K.A.R. 28-31-4(e)(3)) Yes ☐ No ☐ NA ☒

Hazardous Waste-Federal Law Prohibits Improper Disposal.
If found, contact the nearest police or public safety authority or the U.S. EPA.

Generator's Name and Address

Manifest Document Number

XVII. Does generator have placards to offer to transporters in accordance with 49 CFR 172 Subpart F? (K.A.R. 28-31-4(e)(4))

Yes No NA

XVIII. Does generator only use a transporter who is properly registered with the department? (K.A.R. 28-31-4(g))

Yes No NA

Pre-Transport Requirements:

☒ Adequate

☐ Inadequate

☐ NA

Biennial Reports

XIX. Has generator submitted a biennial report(s) to KDHE? (K.A.R. 28-31-4(f)(2))

Yes No NA

A. If Yes, does generator retain copies for three years? (K.A.R. 28-31-4(f)(1)(B))

Yes No NA

Biennial Report Requirements:

☒ Adequate

☐ Inadequate

Special Conditions

XX. Has generator received or transported any hazardous waste to or from a foreign source? (40 CFR Subpart E)

Yes No NA

A. If Yes, has generator filed a Notice with the Secretary of Health and Environment?

Yes No NA

B. Is waste manifested and signed by a foreign consignee?

Yes No NA

C. If generator transports wastes out of the country, has confirmation of delivered shipment been received?

Yes No NA

Special Conditions Requirements:

☐ Adequate

☐ Inadequate

☒ NA

Storage Requirements

XXI. Does generator temporarily store waste before transport?

Yes No

A. For 90 days or less?

Yes No NA

B. For more than 90 days?

Yes No NA

C. If waste is stored in containers:

1. Are containers marked with the words: "Hazardous Waste"? (K.A.R. 28-31-4(g)(3) or (h)(1)(D))

Yes No NA

2. Is the accumulation start date marked on each containers? (K.A.R. 28-31-4(g)(2) or (h)(1)(C))

Yes No NA

3. Are all containers holding hazardous waste closed during storage except when necessary to add or remove waste? (K.A.R. 28-31-4(g)(1) or (h)(1)(B))

Yes No NA

4. Does generator conduct weekly inspections of containers for signs of leakage and/or deterioration caused by corrosion or other factors? (K.A.R. 28-31-4(k))

Yes No NA

a. If Yes, are these inspections documented in a log that includes date and time of inspection, full name of inspector, notations of observations, and date and nature of remedial actions? (K.A.R. 28-31-4(d)/40 CFR 265.15(d))

Yes No NA

5. Are containers holding ignitable or reactive waste(s) located at least 15 meters (50 feet) from the facility's property line? (EPA Generator and T/S/D Only) (K.A.R. 28-31-4(g)(1))

Yes No ☒ NA

6. If waste in containers is incompatible with other materials stored nearby, are the containers separated from the other materials by means of a dike, berm, wall, or other means? (K.A.R. 28-31-4(g)(1) or (h)(1)(B))

Yes No ☒ NA

7. Does generator have any satellite storage areas? (K.A.R. 28-31-4(j))
If yes,

Yes No ☒ NA

a. Is the waste stored in a container at or near the point of generation and under the control of the operator of the process generating the waste?

Yes No

b. Is the container in good condition and closed except to add or remove waste?

Yes No

c. Is the container marked with the words: "Hazardous Waste"?

Yes No

d. Is the container marked with the accumulation start date at the time it becomes full?

Yes No

e. Is the full container moved to the storage area within 3 days after it became full?

Yes No

(If waste(s) is placed in tanks, piles, or surface impoundments complete the appropriate inspection checklist.)

Storage Requirements:

☒ Adequate

☐ Inadequate

☐ NA

Kansas Generator's Emergency Preparedness

XXII. Has facility named one employee as emergency coordinator? (K.A.R. 28-31-4(h)(1)(E))

Yes No

A. Is the emergency coordinator available to respond to an emergency by reaching the facility within a short period of time?

Yes No

B. Is the emergency coordinator or his/her designee prepared to respond to any emergencies (fires, spills, or releases) that arise?

Yes No

C. Is the emergency coordinator familiar with the reporting requirements of K.A.R. 28-31-4(h)(2)?

Yes No

XXIII. Is the following information posted next to at least one telephone which is immediately accessible in an emergency: (K.A.R. 28-31-4(h)(1)(F))

A. Name and telephone of emergency coordinator?

Yes No

B. Location of fire extinguishers, fire alarms, or spill control material, if available?

Yes No

C. Telephone number of fire department unless the facility has a direct alarm?

Yes No NA

XXIV. Have employee's been trained so that they are familiar with proper waste handling and emergency procedures that are relevant to their responsibilities during normal facility operations? (K.A.R. 28-31-4(h)(1)(G))

Yes No

A. Is this training documented in any way?

Yes No

Kansas Generator's Emergency Preparedness Requirements:

☐ Adequate

☐ Inadequate

☐ NA

(If Kansas generator, stop here.)

Preparedness and Prevention

XXV. If appropriate, based upon the nature and quantity of wastes generated and stored at the facility, is the facility equipped with:

- | | | | | |
|--|----------|--------------------------------------|----|----|
| A. Internal communication or alarm system easily accessible in case of emergency?
(K.A.R. 28-31-4(g)(4)/40 CFR 265.32(a)) | Air horn | <input checked="" type="radio"/> Yes | No | NA |
| B. Telephone or hand-held two-way radio capable of summoning emergency response personnel? (K.A.R. 28-31-4(g)(4)/40 CFR 265.32(b)) | | <input checked="" type="radio"/> Yes | No | NA |
| C. Portable fire extinguisher, fire control equipment, spill control equipment, and decontamination equipment? (K.A.R. 28-31-4(g)(4)/40 CFR 265.32(c)) | | <input checked="" type="radio"/> Yes | No | NA |
| D. Is water of adequate volume provided for hose streams, foam producing equipment, sprinklers, etc.? (K.A.R. 28-31-4(g)(4)/40 CFR 265.32(d)) | | <input checked="" type="radio"/> Yes | No | NA |
| E. Is this equipment (A-C above) tested and maintained to assure its proper operation? (K.A.R. 28-31-4(g)(4)/40 CFR 265.33) | | <input checked="" type="radio"/> Yes | No | NA |

XXVI. Does a check of the facility show sufficient aisle space to allow unobstructed movement of personnel and equipment? (K.A.R. 28-31-4(g)(4)/40 CFR 265.35)

☒ Yes No NA

XXVII. If appropriate for the type(s) of waste handled, has the owner/operator made the following arrangements:

- | | | | |
|---|--------------------------------------|----|-------------------------------------|
| A. Familiarized the local emergency authorities with the facility, wastes handled, entrances and exits? (K.A.R. 28-31-4(g)(4)/40 CFR 265.37(a)(1)) | <input checked="" type="radio"/> Yes | No | NA |
| B. Designated one authority where one or more police or fire departments might respond to an emergency? (K.A.R. 28-31-4(g)(4)/40 CFR 265.37(a)(2)) | Yes | No | <input checked="" type="radio"/> NA |
| C. Made agreements with local emergency response teams, emergency response contractors, and equipment suppliers? (K.A.R. 28-31-4(g)(4)/40 CFR 265.37(a)(3)) | Yes | No | <input checked="" type="radio"/> NA |
| D. Familiarized local hospitals with the properties of hazardous waste handled and types of injuries which could result from fires, explosions, or releases at the facility? (K.A.R. 28-31-4(g)(4)/40 CFR 265.37(a)(4)) | <input checked="" type="radio"/> Yes | No | NA |

XXVIII. In cases where local authorities decline to enter into such arrangements, is the refusal entered in the operating record? (K.A.R. 28-31-4(g)(4)/40 CFR 265.37(a)(b))

Yes No ☒ NA

Preparedness and Prevention Requirements:

☒ Adequate

☐ Inadequate

☐ NA

Personnel Training

XXIX. Has the owner/operator established a hazardous waste management training program? (K.A.R. 28-31-4(g)(4)/40 CFR 265.16)

☒ Yes No

A. Is the program directed by a person trained in hazardous waste management? (40 CFR 265.16(a)(2))

☒ Yes No

B. Are new personnel trained within six months after their employment? (40 CFR 265.16(b))

☒ Yes No

C. Are new employees supervised until training is completed? (40 CFR 265.16(b))

☒ Yes No

D. After initial training, are employees trained on an annual basis? (40 CFR 265.16(c))

Yes ☒ No

E. Does the facility maintain the following documents and records:

- | | | |
|---|--------------------------------------|-------------------------------------|
| 1. Job title and job description for each position related to hazardous waste management? (40 CFR 265.16(d)(1) & (2)) | Yes | <input checked="" type="radio"/> No |
| 2. Description of type and amount of training to be given each person? (40 CFR 265.16(d)(3)) | <input checked="" type="radio"/> Yes | No |
| 3. Records of training given to facility personnel? (40 CFR 265.16(d)(4)) | <input checked="" type="radio"/> Yes | No |

Personnel Training Requirements:

☐ Adequate

☐ Inadequate

Contingency Plan

- XXX. Does the facility have a contingency plan? (K.A.R. 28-31-4(g)(4)/40 CFR 265 Subpart D)
If yes,
- | | | |
|--|--------------------------------------|----|
| A. Does the plan list the names(s), home address, and phone numbers of designated emergency coordinator(s) in the order in which they should be contacted? (40 CFR 265.52(d)) | <input checked="" type="radio"/> Yes | No |
| B. Is an emergency coordinator available at all times? (40 CFR 265.55) | <input checked="" type="radio"/> Yes | No |
| C. Does the plan describe emergency actions facility personnel must take to respond to fires, explosions, or releases of hazardous waste? (40 CFR 265.52(a)) | <input checked="" type="radio"/> Yes | No |
| D. Does the plan describe arrangements made with emergency response agencies? (40 CFR 265.52(c)) | <input checked="" type="radio"/> Yes | No |
| E. Does the plan include a list of all emergency equipment at the facility, its location, a physical description of each item on the list, and a brief outline of its capabilities? (40 CFR 265.52(e)) | <input checked="" type="radio"/> Yes | No |
| F. Does the plan include an evacuation plan for facility personnel that describes signals and evacuation routes? (40 CFR 265.52(f)) | <input checked="" type="radio"/> Yes | No |
| G. Have copies of the plan been provided to outside emergency response agencies and hospitals? (40 CFR 265.53) | <input checked="" type="radio"/> Yes | No |

Contingency Plan Requirements:

☒ Adequate

☐ Inadequate

(If EPA generator, stop here.)

Transporter Requirements

XXXI. Does this facility transport hazardous waste?

If yes,

A. Are they registered as a hazardous waste transporter in the State of Kansas? (K.A.R. 28-31-6 (b))

Yes

No

Yes

No

B. Does transporter comply with the manifest requirements of 40 CFR 263.20 except 263.20(h)?

Yes

No

C. Does transporter retain a copy of the manifest for three years? (40 CFR 263.22(a))

Yes

No

D. Does this facility transport hazardous waste subject to the manifest exemption of K.A.R. 28-31-4(d)(7)?
If yes,

Yes

No

1. Does the transporter record the name, address, and EPA ID number of the generator, quantity of waste shipped, DOT shipping information, and the date the waste was accepted in a log or shipping paper?

Yes

No

2. Does the transporter carry this record when transporting the waste to the reclamation facility?

Yes

No

3. Does the transporter retain these records for a period of three years after the termination or expiration of the agreement?

Yes

No

Transporter Requirements:

☐ Adequate

☐ Inadequate

☐ NA

Additional information and conclusions:

The following wastes were manifested in 1989:

DATE	WASTE	AMOUNT	CODE
01/06/89	Sodium hydroxide sludge	2,860 gallons	D002/D005/D006 D007/D008
04/01/89	Sodium hydroxide sludge	2,354 gallons	"
07/10/89	Sodium hydroxide sludge	2,475 gallons	"
11/03/89	Sodium hydroxide sludge	3,000 gallons	"
02/27/90	Sodium hydroxide sludge	3,000 gallons	"
05/24/88	Waste Barsol solvents*	415 gallons	F003/D001

*No longer operated--last shipment

Although manifest dates indicate longer than 90 days between shipments, sludge is not pumped out of the process tanks to the storage barrels for a period of four weeks after each shipment.

Deficiencies observed:

1. Need notification form updated to show new waste code and elimination of waste solvent.
2. No yearly review of hazardous waste training.
3. Need job titles and descriptions for those in hazardous waste management.
4. Burning paint filters.
5. Last two manifests did not have land ban certification attached.

Inspection was done as a yearly RCRA inspection and also as a result of a complaint received that the company was placing plant waste in a salt water injection well.

Investigation found that company has a gas well on the plant grounds that produces salt water. This water is stored in a 1,000 gallon tank and then hauled to their own salt water injection well every two or three months. This information was relayed to the K.C.C.